

# PUBLIC SUBMISSION

<b>As of:</b> February 22, 2010
<b>Received:</b> February 16, 2010
<b>Status:</b> Pending_Post
<b>Tracking No.</b> 80aa59eb
<b>Comments Due:</b> May 03, 2010
<b>Submission Type:</b> Web

**Docket:** EBSA-2009-0010

The Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

**Comment On:** EBSA-2009-0010-0409

Interim Final Rules Under the Paul Wellstone and Pete Domenici Mental Health Parity and Addiction Equity Act of 2008

**Document:** EBSA-2009-0010-DRAFT-0532

Comment on FR Doc # 2010-2167

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## Submitter Information

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### General Comment

We are a third party administrator with several clients on the border of whether or not to cover mental health or substance abuse, with some choosing not to cover inpatient stays or out patient visits, but would at least permit Rx coverage. The final rules make these employers who for financial reasons not able to cover the inpatient or outpatient visit/stay unable to have the compassion to at least provide the drug coverage. We think coverage of Rx only should be an option for this reason. otherwise there will be many forced not to at least have their medications covered which will most likely have an unexpected MHPAEA result.

"As well some plan administrators feel it unfair to consider all MH/SA providers as a generalist, since the plan must certainly pay more for services provided by these providers. We feel this should be taken into consideration as well.